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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,	)	No. CR 11-901 WHA
	)	
Plaintiff,	)	STIPULATION TO WAIVE TIME FROM
	)	JULY 25, 2012 TO AUGUST 24, 2012
v.	)	AND <del>PROPOSED</del> ORDER
	)	
JARRETT PITTMAN-WRIGHT	)	
	)	
Defendant.	)	
	)	

The defendants, JARRETT PITTMAN-WRIGHT, represented by attorney ERICK L. GUZMAN, and DEVA HARRIS, represented by DANIEL BLANK, Assistant Federal Public Defender, and the government, represented by HEATHER M. MELTON, Special Assistant United States Attorney, stipulate that time from July 25, 2012 through August 24, 2012 should be excluded from the Speedy Trial Clock.

This matter is on calendar before the Court this afternoon at 2:00 p.m. The Court has ordered the parties to advise whether they have been able to reach a stipulation as to an exclusion of time; the parties now advise that they have reached such an agreement.

STIPULATION AND ~~PROPOSED~~ ORDER TO WAIVE TIME  
CR 11-00901 WHA

The parties agree that the time between July 25, 2012 and August 24, 2012 is properly excluded for continuity of counsel and effective preparation of counsel, pursuant to Title 18 United States Code, Section 3161(h)(7)(B)(iv). The parties are engaged in the review of discovery and counsels for both the government and both defendants have scheduling conflicts, at different times, between July 25, 2012 and August 24, 2012.

DATED: July 25, 2012

Respectfully submitted,

MELINDA HAAG  
United States Attorney

By\_\_\_\_/s/\_\_\_\_\_  
HEATHER M. MELTON  
Special Assistant U.S. Attorney

DATED: July 25, 2012

By\_\_\_\_/s/\_\_\_\_\_  
ERICK GUZMAN, ESQ.  
Attorney for Defendant Pittman-Wright

DATED: July 25, 2012

BY\_\_\_\_/s/\_\_\_\_\_  
DANIEL BLANK  
Assistant Federal Public Defender

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STIPULATION AND ~~PROPOSED~~ ORDER TO WAIVE TIME  
CR 11-00901 WHA

~~PROPOSED~~ ORDER

Based upon the representation of counsel and for good cause shown, the Court finds that failing to exclude the time between July 25, 2012 and August 24, 2012 would unreasonably deny defense counsels the reasonable time necessary for effective preparation and would unreasonably deny all parties of continuity of counsel, taking into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv). The Court further finds that the ends of justice served by excluding the time between July 25, 2012 and August 24, 2012 from computation under the Speedy Trial Act outweigh the best interests of the public and the defendant in a speedy trial. Therefore, IT IS HEREBY ORDERED that the time between July 25, 2012 and August 24, 2012 shall be excluded from computation under the Speedy Trial Act. 18 U.S.C. § 3161(h)(7)(B)(iv).

DATED: July 25, 2012.



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William Alsup  
UNITED STATES DISTRICT JUDGE